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Matthew J. Platkin and Patrick J. Callahan

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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
TRENTON VICINAGE**

FEDERAL LAW ENFORCEMENT
OFFICERS ASSOCIATION, NEW
JERSEY FRATERNAL ORDER OF
POLICE, RICHARD BOWEN,
JOSEPH JAKUBIEC, and
CHRISTOPHER MARTINEZ,

Plaintiffs,
v.

MATTHEW J. PLATKIN, in his
official capacity as Acting Attorney
General of the State of New Jersey, and
PATRICK J. CALLAHAN, in his
official capacity as Superintendent of
the New Jersey State Police,

Defendants.

Hon. Zahid N. Quraishi, U.S.D.J.
Hon. Tonianne J. Bongiovanni,
U.S.M.J.

Civil Action No. 3:20-cv-05762-ZNQ-TJB

**NOTICE OF MOTION FOR STAY
PENDING APPEAL**

PLEASE TAKE NOTICE that on August 1, 2022, or as soon as counsel may be heard, the undersigned, Matthew J. Platkin, Acting Attorney General of New Jersey, by Tim Sheehan, Deputy Attorney General, on behalf of Defendants, Matthew J. Platkin and Patrick J. Callahan, shall move before the Honorable Zahid N. Quraishi, U.S.D.J., in the United States Courthouse, Trenton, New Jersey, for a stay pending appeal of the District Court's June 21, 2022 Order and Opinion (ECF 60 & 61).

PLEASE TAKE NOTICE that the undersigned will rely on the attached Brief and Declarations of Edwin Lee, Jr., Charles Bogdan, and Rebecca Velez in support of the motion.

A proposed form of Order is attached hereto.

MATTHEW J. PLATKIN
ACTING ATTORNEY GENERAL
OF NEW JERSEY

By: /s/ Tim Sheehan
Tim Sheehan
Deputy Attorney General

Dated: June 30, 2022